



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Revisions to the General Rate
Case Plan for Class A Water
Companies.

R.06-12-016

**AMENDMENTS TO THE COMMENTS AND REPLY COMMENTS OF
THE DIVISION OF RATEPAYER ADVOCATES
ON THE PROPOSED DECISION**

On April 18, 2007 and April 23, 2007, DRA filed comments and reply comments on the Proposed Decision of Commissioner Bohn in the Commission's Rulemaking to consider revisions to the General Rate Case Plan for Class A Water Companies. In these documents DRA mistakenly stated that under the existing rate case plan DRA would have to staff 47 district General Rate Case ("GRC") applications from July 2007 through June 2010. (Comments, p. 6, Reply Comments, p. 2.) However, DRA counsel unintentionally excluded the July 2007 filers in this calculation and used the incorrect number of California-American Water districts as set forth in the current RCP.

Under the existing GRC schedule, DRA would need to staff 57 GRCs during the next RCP cycle. This is not a 40 increase in the number of district GRC applications that DRA would need to review as stated in DRA Comments and Reply Comments but rather a 12 percent increase. While the increase is not as great as DRA noted in comments, DRA's concerns with the Proposed Decision's schedule are unchanged. The proposed schedule still increases DRA's workload unnecessarily—at a time when it is struggling to properly staff all of its existing GRC, OIIs and OIRs--and the schedule does not balance

DRA's workload over the three year cycle to ensure that all applications submitted during that rate case cycle receive a comparable level of scrutiny.

Respectfully submitted,

/s/ Monica McCrary

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April 30, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **AMENDMENTS TO THE COMMENTS AND REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE PROPOSED DECISION** in **R.06-12-016** by using the following service:

☒ **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

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Executed on the **30th** day of **April, 2007** at San Francisco, California.

/s/ Joanne Lark
Joanne Lark

N O T I C E

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